

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

In Re:

Joseph W. Suarez,
Debtor.

Case No. 17-50809
Judge John E. Hoffman, Jr.
Chapter 13

**RELIEF FROM STAY WORKSHEET FOR REAL ESTATE KNOWN AS 7840
OVERLAND TRAIL, DELAWARE, OHIO 43015**

Real property address which is the subject of this motion: 7840 Overland Trail, Delaware, Ohio 43015

1. Debt/Value Representations:

- A. Total indebtedness of the debtor at the time of filing the motion for relief from stay: \$23,297.00
- B. Movant's estimated market value of the real property \$685,000.00

3. Statement of Arrearage:

- A. As of petition filing date: \$0.0
- B. Amounts paid after the date of filing to be applied to the prepetition default: \$0
- C. Postpetition arrearage: \$23,297.00
- D. Annual payment amount: For 2020: \$170.00
- E. Date of last payment: 05/2020
- F. Amount of payments received postpetition: \$N/A
- G. Approximate Total amount of postpetition payments currently in default: \$23,297.00
- H. Plus postpetition late charges: 0.0
- I. Plus other postpetition charges (Attorney Fees): \$1,125.00

J. Total Post Petition Arrearage \$24,422.00

Loan Information: N/A

Worksheet prepared by:

Respectfully submitted,

/s/ Jesse M. Kanitz

Robin L. Strohm (0077665)
Nicholas R. Barnes (0083615)
Brad J. Terman (0083974)
Jesse M. Kanitz (0085438)
Williams & Strohm, LLC, Attorneys at Law
Two Miranova Place, Suite 380
Columbus, Ohio 43215-5668
Telephone: (614) 228-0207
Facsimile: (614) 228-6984
E-Mail: R.Strohm@wslawllc.com
N.Barnes@wslawllc.com
B.Terman@wslawllc.com
J.Kanitz@wslawllc.com
Attorneys for North Orange Homeowners'
Association, Inc

CERTIFICATE OF SERVICE AND

NOTICE OF RIGHT TO RESPOND WITHIN 21 DAYS

The undersigned certifies that a copy of the foregoing Worksheet was served either electronically or by Ordinary Mail this date on the parties whose names and addresses are listed below as and for NOTICE that the attached Worksheet would be filed. The undersigned will present to the Court a proposed order granting the relief sought unless, within twenty-one (21) days after this date, a written memorandum in opposition along with a request for a hearing is filed with the Court and served on the undersigned.

Date Submitted: September 4, 2020

/s/ Jesse M. Kanitz

Robin L. Strohm (0077665)
Nicholas R. Barnes (0083615)
Brad J. Terman (0083974)
Jesse M. Kanitz (0085438)
Williams & Strohm, LLC, Attorneys at Law
Two Miranova Place, Suite 380
Columbus, Ohio 43215-5668
Telephone: (614) 228-0207
Facsimile: (614) 228-6984
E-Mail: R.Strohm@wslawllc.com
N.Barnes@wslawllc.com
B.Terman@wslawllc.com
J.Kanitz@wslawllc.com

Attorneys for North Orange Homeowners' Association, Inc

Name and address of parties served:

Joseph W. Suarez (Ordinary)
7840 Overland Trail
Delaware, Ohio 43015

Faye D. English, Trustee (Electronically)
Brian D. Wood (Electronically)
U.S. Trustee (Electronically)